

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: BAIR HUGGER FORCED AIR
WARMING DEVICES PRODUCTS
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**DECLARATION OF
MONICA L. DAVIES IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION TO
EXCLUDE THE OPINIONS AND
TESTIMONY OF
MICHAEL KEEN, P. ENG., MBA**

Monica L. Davies, being first duly sworn, deposes and declares:

I am an attorney at the law firm of Blackwell Burke P.A., and one of the attorneys representing 3M Company and Arizant Healthcare Inc. (together, "Defendants") in connection with the above-captioned matter. I submit this declaration in support of Defendants' Opposition to Plaintiffs' Motion to Exclude the Opinions and Testimony of Michael Keen, P. Eng., MBA. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.

1. Attached as Defendants' Exhibit DX1 is a true and correct copy of the transcript of the deposition of Michael Keen.
2. Attached as Defendants' Exhibit DX2 is a true and correct copy of excerpts from the transcript of the deposition of Daniel Koenigshofer, P.E.
3. Attached as Defendants' Exhibit DX3 is a true and correct copy of ANSI/ASHRAE/ASHE Standard 170-2013, Ventilation of Health Care Facilities.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 3, 2017

Respectfully submitted,

s/Monica L. Davies

Monica L. Davies